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Attorneys for Defendants,
NATIONAL MEDIA CONNECTION, LLC, NATIONAL
MORTGAGE HELP CENTER, LLC, AND MATTHEW
S. GOLDREICH

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

NEIGHBORHOOD ASSISTANCE
CORPORATION OF AMERICA, a
Massachusetts corporation,

Plaintiff,

v.

NATIONAL MEDIA CONNECTION,
LLC, a Connecticut limited liability
company, THE NATIONAL
MORTGAGE HELP CENTER, LLC, a
Connecticut limited liability company, and
MATTHEW S. GOLDREICH, an
individual,

Defendants.

Case No.: CV-13-01698-CRB

Hon. Judge Charles R. Breyer

**STIPULATION RE RESPONSE
DEADLINE AND CONTINUING
CASE MANAGEMENT
CONFERENCE AND RELATED
DEADLINES AND PROPOSED
ORDER**

Date Complaint Filed: 4/15/13

1 Plaintiff Neighborhood Assistance Corporation of America (“Plaintiff”) and
2 Defendants National Media Connection, LLC, National Mortgage Help Center, LLC,
3 and Matthew S. Goldreich (“Defendants”) hereby stipulate and agree as follows:

4 **STIPULATION**

5 WHEREAS Plaintiff filed its Complaint against Defendants on April 15, 2013;

6 WHEREAS the parties previously stipulated and agreed that each Defendant
7 was served with the Summons and Complaint and that such service was deemed to
8 have occurred on May 1, 2013;

9 WHEREAS the parties previously agreed that Defendants’ response to the
10 Complaint would be due on June 18, 2013; and

11 WHEREAS the parties are now engaged in settlement discussions which may
12 result in a complete resolution of this entire litigation, and now wish to avoid the time
13 and expense of litigating this action while such settlement discussions are ongoing;

14 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and
15 between the parties hereto and their respective undersigned attorneys as follows:

16 1. The last day for Defendants to file a responsive pleading to the
17 Complaint is extended from June 18, 2013 to July 5, 2013; and

18 2. By entering into this Stipulation Defendants do not waive any challenges
19 they may wish to make to the jurisdiction and/or venue of this Court, should this
20 matter not settle.

21 3. The Case Management Conference presently scheduled before the Court
22 on July 19, 2013 at 8:30 a.m. will be continued until August 30, 2013 at 8:30
23 a.m., and all other deadlines set forth in the Court’s Order Setting Case Management
24 Conference dated April 8, 2013 are hereby vacated and shall be continued by thirty
25 (30) days.

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1 Dated: June 12, 2013 FOX ROTHSCHILD LLP

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3 By: /James E. Doroshow/
4 James E. Doroshow
5 Attorneys for Defendants,
6 NATIONAL MEDIA CONNECTION, LLC,
7 NATIONAL MORTGAGE HELP CENTER, LLC,
8 AND MATTHEW S. GOLDREICH

9 Dated: June 12, 2013 KASOWITZ, BENSON, TORRES & FRIEDMAN LLP

10 By: /Christopher J. McNamara/
11 Christopher J. McNamara
12 Attorneys for Plaintiff,
13 NEIGHBORHOOD ASSISTANCE
14 CORPORATION OF AMERICA

15 SO ORDERED:

16 Dated: June 13, 2013

